



State of Utah

Department of Natural Resources

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August 9, 2005

Chuck Semborski, Environmental Supervisor
Energy West Mining Company
P.O. Box 310
Huntington, Utah 84528

Subject: Appendix XI: Phase 3 Area Reclamation Plan (Sediment Pond), PacifiCorp, Des-Bee-Dove Mine, C/015/0017, Task ID #2176, Outgoing File

Dear Mr. Semborski:

Grading, recontouring, and seeding for the Phase 1 and 2 areas of the Des Bee Dove Mine reclamation were completed in 2002 and 2003. Grading, recontouring, and seeding at the pump house area were done in 2000. The sedimentation pond and access road were left in place during this work to provide sediment control while these reclaimed areas stabilized and vegetation became established.

On March 8, 2005 the Division received an application for Phase 3, which is the reclamation of 4.6 acres at the sedimentation pond and 2.27 acres along the 4,000-ft length of the pond-access road. The Phase 3 area is separated from the Phase 1 and Phase 2 areas by an undisturbed ephemeral drainage.

The Phase 3 plan describes an increase in disturbed area down-slope from the pond embankment and use of the pond sediments as substitute topsoil.

In order for us to continue to process your application, please respond to these enclosed deficiencies by November 9, 2005.

If you have any questions, please call me at (801) 538-5268 or Jim Smith at (801) 538-5262

Sincerely,

Pamela Grubaugh-Littig
Permit Supervisor

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Enclosure
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R645-301-121.200, • Please finish the statement concerning the increase in acreage made on page 7 of Section 241 Appendix XVI. • The plan indicates in Table 5-1 that two small drainage channels will be rip rapped and the main drainage channel will be re-established on Mancos Shale bedrock. However, Plates 200-2, 500-5, and 700-1 all show three minor drainages merging into the main drainage. Please correct this inconsistency.

R645-301-223, The MRP indicates that the sediment pond site soils are 15 inches thick and high in gypsum (Section 222). Proposed sampling of the native soils should confirm this assessment. Sample point DBD 505 must represent the average conditions of the added disturbed area. The Division requests that this sample point be located 40 ft down slope from its present location a bit further from the knob.

R645-301-232.100, The plan indicates that the native soils below the pond embankment will be disturbed. The plan must indicate that topsoil from the increased disturbed area will be salvaged and saved. If an average of one foot of topsoil is salvaged from this small area, it could provide four inches of cover for the 4.6-acre site.

R645-301- 224, The plan must include the results of subsoil sampling (described in Section 224) prior to the Division's consideration of sampling pond sediments for use as substitute topsoil.

R645-301-233.100, In the Division's experience, sediments cleared from a pond are not suitable due to their texture (very fine silty clay), which sets up like cement when dry. However R645-301-233.100 allows for a demonstration that the pond sediments are the best available material. The application must include the results of the pond sediment analyses.

R645-301-244.100, Engineering plans indicate that boulders will be placed on the slopes "if available" (Section 552 and 553). According to the baseline soils information provided, the adjacent ground has 50 – 75% rock and boulder cover. The plan must provide a percent cover standard to be achieved at reclamation.

R645-301-121.200, -731.200, Ongoing quarterly surface-water monitoring that "will be" done is described in Section R645-301-731.200, but there is no description of the monitoring site nor is one identified on maps in Appendix XVI. This statement undoubtedly refers to current operational monitoring, but the indication in this reclamation amendment that this monitoring "will be" done is potentially confusing. The status of surface-water monitoring after removal of the pond needs to be clarified.

R645-301-121.200, In Section R6745-301-762.100, in the last sentence under Discharge Methodologies, Appendix A is cited as the location for all channel design calculations. Appendix A contains a Storm hydrograph printout, and the last page is a title sheet for Trapezoidal Channel Design, but there is nothing following this sheet. Appendix B is labeled Channel Design Information and it contains photos, FlowMaster printouts, and cross sections for the main channel. The Permittee needs to clarify in the narrative in Section R6745-301-762.100 where channel designs and calculations are located in the plan.